

AKIN GUMP STRAUSS HAUER & FELD LLP

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*Proposed Counsel to the Official Committee of Unsecured
Creditors of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
)	Case No. 19-23649 (RDD)
PURDUE PHARMA L.P., <i>et al.</i> , ¹)	
)	Jointly Administered
)	
Debtors.)	
)	

**NOTICE OF (A) FILING OF UNREDACTED (I) OBJECTION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS OF PURDUE PHARMA L.P.,
ET AL. TO DEBTORS' MOTION TO ASSUME THE PREPETITION
REIMBURSEMENT AGREEMENT WITH THE AD HOC COMMITTEE, AND TO PAY
THE FEES AND EXPENSES OF THE AD HOC COMMITTEE'S PROFESSIONALS
AND (II) DECLARATION OF ARIK PREIS IN SUPPORT THEREOF AND (B)
WITHDRAWAL OF SEALING MOTION**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

PLEASE TAKE NOTICE that on November 12, 2019, the Official Committee of Unsecured Creditors (the “**Official Committee**”) of Purdue Pharma L.P., *et al.* filed the Objection of the Official Committee of Unsecured Creditors of Purdue Pharma L.P., *et al.* to Debtors’ Motion to Assume the Prepetition Reimbursement Agreement with the Ad Hoc Committee (“**CAHC**”), and to Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals [ECF No. 459] (the “**Objection**”) and the Declaration of Arik Preis in Support thereof [ECF No. 460] (the “**Declaration**”) in redacted form in accordance with confidentiality requests made by counsel to the CAHC.

PLEASE TAKE FURTHER NOTICE that by email dated November 13, 2019, the Court questioned whether the redacted material is protected from disclosure under 11 U.S.C. § 107(b), and asked the parties requesting confidential treatment of that material to respond by November 15, 2019. On November 14, 2019, counsel for the CAHC replied by email and advised that it had reviewed the filed pleadings and on behalf of the CAHC withdrew the confidentiality restriction to allow the disclosure of the information previously redacted. Accordingly, the Official Committee hereby files the unredacted Objection and Declaration.

PLEASE TAKE FURTHER NOTICE that, based on the CAHC’s withdrawal of the confidentiality restriction it previously had requested, the Official Committee withdraws its Motion for an Order Pursuant to Bankruptcy Code Sections 105(a) and 107(b) and Bankruptcy Rule 9018 Authorizing the Filing under Seal of Portions of the Objection of the Official Committee of Unsecured Creditors of Purdue Pharma L.P., *et al.* to Debtors’ Motion to Assume the Prepetition Reimbursement Agreement with the Ad Hoc Committee, and to Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals [ECF No. 455] (the “**Sealing Motion**”).

Dated: November 14, 2019
New York, NY

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